

177406

49

NOV 04 1988

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Stephen M. Molt  
Project Coordinator  
Environmental Control Department  
ML Industries, Inc., P.O. Box 1000  
Hightstown, NJ 08520

Dear Mr. Molt:

Pursuant to Paragraph 17 of the Remedial Investigation/Feasibility Study (RI/FS) Administrative Order by Consent (Order), the U.S. EPA and Illinois EPA hereby present to ML Industries necessary changes to the September 1988 RI Report. If ML Industries does not respond to these changes within 15 calendar days of receipt of this letter, then the September 1988 RI Report shall be considered approved, and the September 1988 RI Report, with necessary changes, shall be considered an integral and enforceable part of the Consent Order. The following are necessary changes to the September 1988 RI Report:

Page F-5, "Risk Assessment" Paragraph-delete the last two sentences of this paragraph.

Page 24, First Paragraph, second sentence and Second Paragraph, third sentence-substitute "beneath a portion of the slagpile" for "beneath a minimum of 72% of the (surface area of the) slagpile."

Page 24, First Paragraph - delete the third sentence of this paragraph.

Page 40, first sentence - substitute "2100" for "1770" and "3170" for "2650".

Pages 72-83, Section P, "Risk Assessment" - delete the portions of the Risk Assessment which present and describe the Illinois Department of Public Health Blood Lead Survey Approach, the Acceptable Daily Intake Approach, and the Soil Lead-Blood Lead Correlation Approach for lead in soil.

Page 83, Second Paragraph, last sentence - delete "not acceptable levels from a site specific risk assessment perspective as required by EPA 1986 b" from this sentence, and add the following sentence to this paragraph: "In the absence of a toxicity value for lead in soil, which makes a site specific risk assessment impossible to perform for lead in soil, the above recommendation of the Center for Disease Control has been adopted".

page 84, last paragraph - delete this paragraph and replace with: "Due to the absence of a toxicity value for lead in soil, a quantitative risk assessment was not performed for lead soil. In lieu of a quantitative risk assessment for lead in soil, the recommendation of the Center for Disease Control has been adopted, namely: 'In general, lead in soil and dust appears to be responsible for blood lead levels in children increasing above background levels when the concentration in soil or dust exceeds 500-1000 ppm'. Several fill areas in the residential area east of the site and in the remote fill areas in Venice and Eagle Point Acres exceeded 500-1000 ppm lead and, therefore, present a potential unacceptable risk to public health in these areas. It is also clear from the risk assessment that lead is the primary contaminant of concern in the soil".

Table 13, "Variation Column-Delete" as determined by the site-specific risk assessment - from the criteria for soil and the waste site exposure - always.

Table 13 - Delete "lead" and the associated numerical values for lead from this table.

The above necessary changes have been previously discussed with and/or made available to you at our August 3 and 4, 1988 meeting and in my September 7, 1988 letter to Frank Ate, Division 4 Corp. The rationale behind some of the necessary changes is provided in the September 7, 1988 letter, which is attached hereto for reference. The rationale for deletion of the soil lead-blood lead approach in the risk assessment is as follows: A number of researchers have conducted studies which describe the positive relationship between lead in soil and children's blood lead and have constructed multiple linear regression models that show soil lead frequently contributes to explaining children's blood lead levels. A range of values for the slope of the relationship between soil lead and children's blood lead levels are found. The soil lead-blood lead correlation approach developed in the risk assessment study takes a slope from the lower end of this range of slopes. Use of a higher slope value from the literature, which is equally justifiable, would yield tolerable soil lead levels in the 500-1000 ppm range recommended by the Center for Disease Control, as cited in the September 7, 1988 letter.

-3-

Please contact me at (312) 436-4742 if you have any questions or comments concerning this letter.

Sincerely yours,

Brad Bradley,  
U.S. EPA Project Coordinator

Attachment

cc: Ken Miller, IEPA  
Nancy Mackiewicz, IEPA

bcc: Beverly J. Kush, 11/In 43  
R. Grimes, SCS-TUR-3  
D. Dolan, SHR-12  
H. Klevs, SGP-26  
J. Spencer, SHR-13  
G. Wittman, SMD-TUR-OR

SHS-11:BRBradley:dc:CEPCLA:11/7/98:Telex 43

P 837 849 609

RECEIPT FOR CERTIFIED MAIL

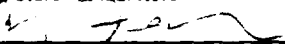
NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to <b>Mr. Stephen W. Holt</b>	
<b>Project Coordinator</b>	
Street and No. <b>Environmental Control</b>	
<b>Department/NL Industries, Inc.</b>	
P.O. State and ZIP Code <b>P.O. Box 1090</b>	
<b>Hightstown, NJ 08520</b>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom Date and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985

SHS-11 B. Bradley

<p>● <b>SENDER:</b> Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.</p> <p>Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. <u>The return receipt fee will provide you the name of the person delivered to and the date of delivery.</u> For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.</p> <p>1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. <span style="float: right;">2. <input type="checkbox"/> Restricted Delivery</span>  <span style="display: block; text-align: center;">†(Extra charge)†</span></p>	
<p>3. Article Addressed to:</p> <p>Mr. Stephen W. Holt  Project Coordinator  Environmental Control Department  NL Industries, Inc., P.O. Box 1090  Hightstown, NJ 08520</p>	<p>4. Article Number</p> <p>P837 849 609</p>
	<p>Type of Service:</p> <p><input type="checkbox"/> Registered <span style="margin-left: 100px;"><input type="checkbox"/> Insured</span>  <input type="checkbox"/> Certified <span style="margin-left: 100px;"><input type="checkbox"/> COD</span>  <input type="checkbox"/> Express Mail</p>
	<p>Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b></p>
<p>5. Signature — Addressee</p> <p>X </p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature — Agent</p> <p>X</p>	
<p>7. Date of Delivery</p>	

UNITED STATES POSTAL SERVICE  
OFFICIAL BUSINESS



**SENDER INSTRUCTIONS**

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE  
USE, \$300

RETURN  
TO

Print Sender's name, address, and ZIP Code in the space below.

(5HS-11)

B. Bradley

U.S. Environmental Protection Agency

230 South Dearborn Street

Chicago, Illinois 60604